

Remarks

Claims 2-8, 10-17, 35-41, and 43-50 have been rejected. No amendments are made.

Claim Rejections under 35 U.S.C. § 103(a)

The Office rejected claims 2-8, 10-17, 35-41, and 43-50 under 35 U.S.C. § 103(a) as being unpatentable over the combination of US Patent App. No. 2003/0093694 filed by Medvinsky et al ("Medvinsky"), US Patent No. 5,809,144 issued to Sirbu et al ("Sirbu"), and US Patent No. 6,286,104 issued to Buhle et al ("Buhle") using a motivation to combine rationale. To establish a *prima facie* case for obviousness using a motivation to combine rationale, the Office must find that all claim elements are taught or suggested by the cited references and that there would have been a motivation to combine the references, that there would have been a reasonable expectation of success, plus any additional findings that the Graham factual inquiries require.¹ All findings must be supported by an "articulated reasoning with some rational underpinning."² Once a *prima facie* case is established, the applicant may present evidence to rebut the finding of obviousness.³ Because not all claim elements are taught or suggested by the combination, Applicants submit that these claims are patentable over the combination.

Independent claim 7 recites: A method of generating a Service Ticket for a requested Service comprising:

receiving by a granting service of a computing device, the
computing device being different and distinct from a client, a request for a
Service Ticket from the client
the granting service determining if the requested service is provided
by a plurality of servers:
if not, the granting service generating the Service Ticket
utilizing a single server mode; and
if so, the granting service:

¹ See MPEP 2143, section (G).

² See MPEP 2142.

³ See MPEP 2145.

generating a session key;
encrypting a cipher text with the session key
determining a number of servers designated to provide the
requested service;
for each providing server, encrypting the session key with a
secret key associated with each respective server;
creating a Service Ticket that includes an encrypted session
key for each providing server, and the encrypted cipher text; and
transmitting the Service Ticket to the client.

Examiner cites Buhle figure 3 and column 8, lines 14-19 as teaching the underlined recitation from claim 7 above. Buhle describes a database system that seeks to remedy perceived deficiencies of “middle-tier” servers. In particular, middle-tier servers (e.g. web servers) act as an interface between clients and database servers. Existing methods of providing this interface were considered too insecure. But in embodiments described in Buhle, a middle-tier server authenticates to the database server using its own credentials and then, upon client request, it creates a new session for the client using the client’s username and the middle-tier server’s credentials. This is supposed to prevent a middle-tier server from performing operations it is not authorized to do using the client’s credentials. (See generally the summary of the invention.)

The text in column 8, lines 14-19 describes step 310 of figure 3. Here, it is disclosed that the middle-tier server (“ServerN”) receives credentials from multiple data servers that it will use to establish client sessions with the data servers. But nowhere does Buhle describe “creating a Service Ticket that includes an encrypted session key for each providing server, and the encrypted cipher text” as required by claim 7. Even assuming for the sake of argument, that the data servers are the “providing servers” of claim 7 and that the credentials for each data server can be construed as “session keys”, there is simply no disclosure that Buhle creates anything that could be described as a service ticket that includes encrypted versions of such credentials from each data server. To the extent that it could generate something construed as a “service ticket” including an encrypted session key for each server, mere probabilities are not sufficient to show inherency.

Furthermore, there would have been no motivation to modify Buhle to achieve the underlined claim element. The purpose of Buhle is to eliminate perceived security risks when web servers access database servers on behalf of clients. To do so, the web servers establish data server sessions on behalf of client devices using their own credentials to prevent unauthorized access by the middle-tier server. But it would not have been helpful to include encrypted versions of the credentials from all data servers in a single data structure that could be termed a “service ticket” to be transmitted to the clients as required by claim 7. Doing so would have increased complexity without providing any useful result. Thus for at least these reasons, one of ordinary skill would have found no suggestion to modify Buhle to create “a Service Ticket that includes an encrypted session key for each providing server, and the encrypted cipher text” as required by claim 7.

For at least these reasons, Applicants submit that not all elements of claim 7 are taught or suggested by the combination of Medvinsky, Sirbu, and Buhle. Thus, Applicants respectfully submit that claim 7 is patentable over the combination. Claims 2-6 and 8 depend from claim 7. Thus, for at least the same reasons, Applicants submit that these claims are also patentable over the combination.

Independent claims 13, 40, and 46 contain subject matter generally similar to claim 7. Also, claims 11-12 and 14-17 depend from claim 13, claims 35-39 and 41 depend from claim 40, and claims 43-45 and 47-50 depend from claim 46. Thus, for at least the same reasons as with claim 7 above, Applicants submit that claims 10-17, 35-41, and 43-50 are also patentable over the combination.

Conclusion

Applicant submits that all pending claims are in condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present paper, the Examiner is kindly requested to contact the undersigned at (206) 407-1518. If any fees are due in connection with filing this

paper, the Commissioner is authorized to charge the Deposit Account of Schwabe, Williamson and Wyatt, P.C., No. 50-0393.

Respectfully submitted,
SCHWABE, WILLIAMSON & WYATT, P.C.

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/Richard B. Leggett/
Richard B. Leggett
Reg. No. 59,485

Pacwest Center, Suite 1900
1211 SW Fifth Avenue
Portland, Oregon 97204
Telephone: (503)222-9981